

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO FIRST REQUEST FOR ADMISSIONS OF AMERICAN POSTAL
WORKERS UNION, AFL-CIO
(APWU/USPS-1/1-13)
(May 26, 2021)**

The United States Postal Service hereby provides the responses of institutional witness Sharon Owens to First Request for Admissions of American Postal Workers, AFL-CIO, filed as of May 19, 2021. Each request is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 26, 2021

**RESPONSES OF THE UNITED STATES POSTAL SERVICE INSTITUTIONAL
WITNESS TO FIRST REQUEST FOR ADMISSIONS OF AMERICAN POSTAL
WORKERS UNION, AFL-CIO**

APWU/USPS-1/1. The Postal Service did not study the impact of the service standard changes proposed in the Request for an Advisory Opinion in Docket No. N2021-1 on individual mail consumers.

RESPONSE:

Denied. See Direct Testimony of Thomas E. Thress on Behalf of the United States Postal Service (USPS-T-5), PRC Docket No. N2021-1 (Apr. 21, 2021) at 5-34, 36-37 (examining the impact of changes to average days to delivery on Single-Piece First Class Mail); see *also* Direct Testimony of Steven Monteith on Behalf of the United States Postal Service (USPS-T-4), PRC Docket No. N2021-1 (Apr. 21, 2021), at 12-20.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE INSTITUTIONAL
WITNESS TO FIRST REQUEST FOR ADMISSIONS OF AMERICAN POSTAL
WORKERS UNION, AFL-CIO**

APWU/USPS-1/2. The Postal Service did not study the impact of the service standard changes proposed in the Request for an Advisory Opinion in Docket No. N2021-1 on low-income communities.

RESPONSE:

Admitted.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE INSTITUTIONAL
WITNESS TO FIRST REQUEST FOR ADMISSIONS OF AMERICAN POSTAL
WORKERS UNION, AFL-CIO**

APWU/USPS-1/3. The Postal Service did not study the impact of the service standard changes proposed in the Request for an Advisory Opinion in Docket No. N2021-1 on elderly consumers of the mail.

RESPONSE:

Admitted.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE INSTITUTIONAL
WITNESS TO FIRST REQUEST FOR ADMISSIONS OF AMERICAN POSTAL
WORKERS UNION, AFL-CIO**

APWU/USPS-1/4. The Postal Service did not study the impact of the service standard changes proposed in the Request for an Advisory Opinion in Docket No. N2021-1 on rural communities or mailers.

RESPONSE:

Denied. See Direct Testimony of Stephen Hagenstein on Behalf of the United States Postal Service (USPS-T-3), PRC Docket No. N2021-1 (Apr. 21, 2021), at 24; USPS-LR-N2021-1-3 (title “Model Results”), file title “3_SSD_5D_Vol_Impacts_CONUS.xlsx.”

**RESPONSES OF THE UNITED STATES POSTAL SERVICE INSTITUTIONAL
WITNESS TO FIRST REQUEST FOR ADMISSIONS OF AMERICAN POSTAL
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APWU/USPS-1/5. The Postal Service did not study the impact of the service standard changes proposed in the Request for an Advisory Opinion in Docket No. N2021-1 on individual mail consumers' future use of postal services.

RESPONSE:

Denied. See Direct Testimony of Thomas E. Thress on Behalf of the United States Postal Service (USPS-T-5), PRC Docket No. N2021-1 (Apr. 21, 2021), at 5-34, 36-37 (examining the impact of changes to average days to delivery on Single-Piece First Class Mail); *see also* Direct Testimony of Steven Monteith on Behalf of the United States Postal Service (USPS-T-4), PRC Docket No. N2021 1 (Apr. 21, 2021), at 12-20.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE INSTITUTIONAL
WITNESS TO FIRST REQUEST FOR ADMISSIONS OF AMERICAN POSTAL
WORKERS UNION, AFL-CIO**

APWU/USPS-1/6. The Postal Service did not study the impact of the service standard changes proposed in the Request for an Advisory Opinion in Docket No. N2021-1 on small businesses' future use of postal services.

RESPONSE:

Denied. See Direct Testimony of Thomas E. Thress on Behalf of the United States Postal Service (USPS-T-5), PRC Docket No. N2021-1 (Apr. 21, 2021), at 5-34, 36-37 (examining the impact of changes to average days to delivery on Workshared First Class Mail); *see also* Direct Testimony of Steven Monteith on Behalf of the United States Postal Service (USPS-T-4), PRC Docket No. N2021-1 (Apr. 21, 2021), at 12-18.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE INSTITUTIONAL
WITNESS TO FIRST REQUEST FOR ADMISSIONS OF AMERICAN POSTAL
WORKERS UNION, AFL-CIO**

APWU/USPS-1/7. The Postal Service did not study the impact of the service standard changes proposed in the Request for an Advisory Opinion in Docket No. N2021-1 on Election Mail.

RESPONSE:

Denied. See Direct Testimony of Robert Cintron on Behalf of the United States

Postal Service (USPS-T-1), PRC Docket No. N2021-1 (Apr. 21, 2021), at 17

n.12.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE INSTITUTIONAL
WITNESS TO FIRST REQUEST FOR ADMISSIONS OF AMERICAN POSTAL
WORKERS UNION, AFL-CIO**

APWU/USPS-1/8. The Postal Service did not consult with state or local election officials regarding the impact of the service standard changes proposed in the Request for an Advisory Opinion in Docket No. N2021-1 on Election Mail.

RESPONSE:

Denied. See USPS Witness Monteith's Response to POIR No. 2, Question 19

(filed May 21, 2021); USPS Witness Monteith's Response to POIR No. 1,

Question 31 (filed May 17, 2021).

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WORKERS UNION, AFL-CIO**

APWU/USPS-1/9. The Postal Service did not study the impact of the service standard changes proposed in the Request for an Advisory Opinion in Docket No. N2021-1 on Election Mail from overseas voters, overseas military personnel, or military personnel stationed domestically away from their voting residence.

RESPONSE:

Admitted.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE INSTITUTIONAL
WITNESS TO FIRST REQUEST FOR ADMISSIONS OF AMERICAN POSTAL
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APWU/USPS-1/10. The Postal Service did not consult in any manner with any election officials regarding the impact of the proposed services standard changes in the Request for an Advisory Opinion in Docket No. N2021-1 on Election Mail from overseas voters, overseas military personnel, or military personnel stationed domestically away from their voting residence.

RESPONSE:

Admitted in part and denied in part. Vote by mail (e.g., absentee ballots) relates to overseas voters, overseas military personnel, and military personnel stationed domestically away from their voting residence. The Postal Service discussed vote by mail with election officials, though did not specifically discuss the impact of the proposed service standard changes on overseas voters, overseas military personnel, and military personnel stationed domestically away from their voting residence.

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APWU/USPS-1/11. The price difference between postage for First Class Mail and postage for Priority Mail is over \$6 per mail piece.

RESPONSE:

Denied. For example, a 12.5oz FCM Flat with a retail price \$3.40 could be mailed as a less than one-pound Priority Mail (Retail) Zone Local 1 & 2 for \$7.70, a difference of only \$4.30.

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APWU/USPS-1/12. Local election officials in the same state will have different service standards from one another for Election Mail sent and received by their offices depending on where they are located within the state.

RESPONSE:

Denied. Service *standards* will not necessarily vary based on the location of election offices.

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APWU/USPS-1/13. The strategic plan entitled “*Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence*” attached to this Request for Admissions as Exhibit A is a true and correct copy of the plan referenced on page 9 of the Postal Service’s Request for an Advisory Opinion in Docket No. N2021-1.

RESPONSE:

Admitted.